

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

TRANSOCEAN OFFSHORE DEEPWATER DRILLING INC.	§	
Plaintiff,	§	
v.	§	
	§	CASE NO: 4:17-cv-123
	§	
NOBLE CORPORATION PLC, NOBLE CORPORATION, NOBLE DRILLING AMERICAS LLC, NOBLE DRILLING EXPLORATION COMPANY, NOBLE DRILLING HOLDING LLC, NOBLE DRILLING SERVICES INC., NOBLE DRILLING (U.S.) LLC, NOBLE DRILLING (U.S.) INC.	§	JURY DEMANDED
Defendants.	§	
	§	

PLAINTIFF TRANSOCEAN'S ORIGINAL COMPLAINT

Transocean Offshore Deepwater Drilling Inc. (“Transocean”), for its complaint of patent infringement against defendants Noble Corporation plc, Noble Corporation, Noble Drilling Americas LLC, Noble Drilling Exploration Company, Noble Drilling Holding LLC, Noble Drilling Services Inc., Noble Drilling (U.S.) LLC, Noble Drilling (U.S.) Inc. (collectively “Noble”), alleges as follows:

THE PARTIES

1. Plaintiff Transocean is a Delaware corporation having a place of business at 4 Greenway Plaza, Houston, Texas 77046.

2. On information and belief, Noble Corporation plc is a public limited liability company incorporated under the laws of England and Wales with its principal place of business and registered office at Devonshire House, 1 Mayfair Place, London, W1J 8AJ England.
3. On information and belief, Noble Corporation is a Cayman Islands company with its principal a place of business at 13135 South Dairy Ashford, Suite 800, Sugar Land, TX 77478.
4. On information and belief, Noble Drilling Americas LLC is a Delaware limited liability company with its principal place of business at 13135 South Dairy Ashford, Suite 800, Sugar Land, TX 77478.
5. On information and belief, Noble Drilling Exploration Company is a Delaware corporation with its principal place of business at 13135 South Dairy Ashford, Suite 800, Sugar Land, TX 77478.
6. On information and belief, Noble Drilling Holding LLC is a Delaware limited liability company with its principal place of business at 13135 South Dairy Ashford, Suite 800, Sugar Land, TX 77478.
7. On information and belief, Noble Drilling Services Inc. is a Delaware corporation with its principal place of business at 13135 South Dairy Ashford, Suite 800, Sugar Land, TX 77478.
8. On information and belief, Noble Drilling (U.S.) LLC is a Delaware limited liability company with its principal place of business at 13135 South Dairy Ashford, Suite 800, Sugar Land, TX 77478.
9. On information and belief, Noble Drilling (U.S.) Inc. is a Delaware corporation with its principal place of business at 13135 South Dairy Ashford, Suite 800, Sugar Land, TX 77478.

JURISDICTION & VENUE

10. This action arises under the patent statutes of the United States, 35 U.S.C. § 271 *et seq.* Accordingly, the Court has federal question jurisdiction over this matter under 28 U.S.C. §§ 1331 and 1338(a).

11. The court has personal jurisdiction over each Noble defendant.

12. Venue is properly within this District in accordance with 28 U.S.C. § 1391 (b) and (c) and § 1400 (b).

FACTS AND BACKGROUND

The Transocean Patents

13. On April 11, 2000, United States Patent No. 6,047,781 (the “‘781 Patent”) was issued for an invention entitled Multi-Activity Offshore Exploration and/or Development Drilling Method and Apparatus. A copy of the ‘781 Patent is attached as Exhibit A and incorporated herein.

14. On May 2, 2000, United States Patent No. 6,056,071 (the “‘071 Patent”) was issued for an invention entitled Multi-Activity Offshore Exploration and/or Development Drilling Method and Apparatus. A copy of the ‘071 Patent is attached as Exhibit B and incorporated herein.

15. On May 30, 2000, United States Patent No. 6,068,069 (the “‘069 Patent”) was issued for an invention entitled Multi-Activity Offshore Exploration and/or Development Drilling Method and Apparatus. A copy of the ‘069 Patent is attached as Exhibit C and incorporated herein.

16. On July 11, 2000, United States Patent No. 6,085,851 (the “‘851 Patent”) was issued for an invention entitled Multi-Activity Offshore Exploration and/or Development Drill Method and Apparatus. A copy of the ‘851 Patent is attached as Exhibit D and incorporated herein.

17. The above referenced patents relate to a technology called “dual-activity” that saves time and money in drilling offshore wells. Transocean owns these patents (collectively, the “Transocean patents”) by assignment dated March 9, 2004.

Noble Infringes the Transocean Patents

Bob Douglas

18. On information and belief, Noble or Noble affiliates had constructed a dual-activity drillship for offshore drilling operations referred to as the *Bob Douglas*. On information and belief, the design of the drillship is covered by the Transocean patents.

19. On information and belief, Noble or Noble affiliates contracted with Anadarko on or before July 12, 2012 to provide the *Bob Douglas* for an initial term of three (3) years at a daily rate of approximately \$635,000 for offshore drilling operations in the U.S. Gulf of Mexico.

20. On information and belief, Noble or Noble affiliates began operations under the contract with Anadarko by June 2014 with the *Bob Douglas* in the U.S. Gulf of Mexico.

Don Taylor

21. On information and belief, Noble or Noble affiliates had constructed a dual-activity drillship for offshore drilling operations referred to as the *Don Taylor*. On information and belief, the design of the drillship is covered by the Transocean patents.

22. On information and belief, Noble or Noble affiliates contracted with Shell by January 2011 to provide the *Don Taylor* for an initial term of sixty six (66) months at a daily rate of approximately \$482,000 for offshore drilling operations in the U.S. Gulf of Mexico.

23. On information and belief, Noble or Noble affiliates began operations under the contract with Shell by August 2013 with the *Don Taylor* in the U.S. Gulf of Mexico.

Globetrotter I

24. On information and belief, Noble or Noble affiliates had constructed a dual-activity drillship for offshore drilling operations referred to as the *Globetrotter I*. On information and belief, the design of the drillship is covered by the Transocean patents.
25. On information and belief, Noble or Noble affiliates contracted with Shell by June 2010 to provide the *Globetrotter I* for an initial term of 10 years at a daily rate of approximately \$275,000 for offshore drilling operations in the U.S. Gulf of Mexico.
26. On information and belief, Noble or Noble affiliates began operations under the contract with Shell by September 2012 with the *Globetrotter I* in the U.S. Gulf of Mexico.

Sam Croft

27. On information and belief, Noble or Noble affiliates had constructed a dual-activity drillship for offshore drilling operations referred to as the *Sam Croft*.
28. On information and belief, the design of the drillship is covered by the Transocean patents.
29. On information and belief, Noble or Noble affiliates contracted with Plains Exploration & Production Company or its designee by July 2014 to provide the *Sam Croft* for an initial term of at least twenty one (21) months at a daily rate of approximately \$643,000 for offshore drilling operations in the U.S. Gulf of Mexico.
30. On information and belief, Noble or Noble affiliates began operations under the contract with Plains Exploration & Production Company or its designee by July 2014 with the *Sam Croft* in the U.S. Gulf of Mexico.

Tom Madden

31. On information and belief, Noble or Noble affiliates had constructed a dual-activity drillship for offshore drilling operations referred to as the *Tom Madden*. On information and belief, the design of the drillship is covered by the Transocean patents.
32. On information and belief, Noble or Noble affiliates contracted with Plains Exploration & Production Company or its designee by November 2014 to provide the *Tom Madden* for an initial term of at least seventeen (17) months at a daily rate of approximately \$637,000 for offshore drilling operations in the U.S. Gulf of Mexico.
33. On information and belief, Noble or Noble affiliates began operations under the contract with Plains Exploration & Production Company or its designee by November 2014 with the *Tom Madden* in the U.S. Gulf of Mexico.

Count 1: Patent Infringement

34. Transocean incorporates herein the allegations set forth in Paragraphs 1 through 33 above.
35. Under 35 U.S.C. §§ 271 *et seq.*, the Noble defendants have infringed the Transocean patents by the unauthorized sale, offer for sale, and importation and use of the *Bob Douglas*, *Don Taylor*, *Globetrotter I*, *Sam Croft* and *Tom Madden* or alternatively by actively contributing or inducing a named affiliate or others to sell, offer for sale, import, or use *Bob Douglas*, *Don Taylor*, *Globetrotter I*, *Sam Croft* and *Tom Madden* without authority, literally and/or under the doctrine of equivalents.
36. Transocean has been damaged by the Noble defendants' infringing acts.
37. On information and belief, the Noble defendants were actually aware of the Transocean patents and willfully committed acts of infringement.

JURY DEMAND

38. Transocean demands a trial by jury on all issues.

PRAYER FOR RELIEF

WHEREFORE, Transocean prays the Court to:

- (a) award damages for Noble's infringement of the Transocean patents under 35 U.S.C. § 284;
- (b) find that Noble's infringement has been willful and increase such damages to three times the awarded amount;
- (c) award prejudgment and post judgment interest;
- (d) find that this case is an exceptional case under 35 U.S.C. § 285 and award attorneys' fees;
- (e) award costs; and
- (f) grant all other relief to which Transocean is entitled.

Date: January 16, 2017

Respectfully submitted,

AMATONG MCCOY LLC

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